

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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A. General Information

Grantee Name	Montgomery County, Maryland
Name of Entity or Department Administering Funds	Department of Health and Human Services
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Nadim Khan
Title	Chief, Special Needs Housing Services
Address Line 1	401 Hungerford Drive
Address Line 2	5 th Floor
City, State, Zip Code	Rockville, MD 20850
Telephone	240-777-1179
Fax	240-777-1494
Email Address	nadim.khan@montgomerycountymd.gov
Authorized Official (if different from Contact Person)	Kathleen Boucher
Title	Assistant Chief Administrative Officer
Address Line 1	101 Monroe Street
Address Line 2	2 nd Floor
City, State, Zip Code	Rockville, MD 20850
Telephone	240-777-2500
Fax	240-777-2517
Email Address	
Web Address where this Form is Posted	http://www.montgomerycountymd.gov/apps/dhca/index.asp

Amount Grantee is Eligible to Receive*	\$2,104,743
Amount Grantee is Requesting	\$2,104,743

*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

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B. Citizen Participation and Public Comment

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Response:

A newspaper advertisement was published in the *Montgomery Sentinel*, a newspaper of general circulation, on Thursday, April 9, 2009, inviting the public to review and comment on the draft substantial amendment and participate in a Public Hearing on April 23, 2009. Comments on the draft substantial amendment are accepted until May 9, 2009, and all comments will be considered.

The substantial amendment is posted on the Department of Housing & Community Affairs web site, with the web address given in the advertisement, and is also available in alternative formats upon request.

The Department of Health and Human Services (DHHS) will disseminate the draft substantial amendment to and will consult with the following groups involved in prevention of homelessness and/or assistance to those experiencing homelessness : Housing First Leadership Workgroup/Continuum of Care Governing Board, "Family Providers" group, Homeless Adult Team, the County's Emergency Assistance Coalition and those involved in the DHHS Safety Net Program. The membership of the aforementioned groups will be contacted via email, providing a link to the substantial amendment on the DHCA web along with the date, time and location of the Public Hearing

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options: (**Note: response provided after comment period closes**)

- ☒ Grantee did not receive public comments.
- ☐ Grantee received and accepted all public comments.
- ☐ Grantee received public comments and did not accept one or more of the comments.

3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

Response:

No public comments received.

C. Distribution and Administration of Funds

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Reminder: The HPRP grant will be made by means of a grant agreement executed by HUD and the grantee. The three-year deadline to expend funds begins when HUD signs the grant agreement. Grantees should ensure that sufficient planning is in place to begin to expend funds shortly after grant agreement.

1. Check the process(es) that the grantee plans to use to select subgrantees. Note that a subgrantee is defined as the organization to which the grantee provides HPRP funds.

☒ Competitive Process

☐ Formula Allocation

☐ Other (Specify: There are no sub grantees)

2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

Response:

The HPRP grant will enable DHHS to serve additional households through the expansion of those served through existing programs. DHHS has an Open Solicitation for service coordination/case management services, and all non-profits will have an opportunity to apply through this competitive procurement process for HPRP funds. After the applicant submits the required information and documents, and following a review by the County to determine the applicant meets the minimum qualifications required for services to be provided by the applicant under this Open Solicitation, the County will execute a contract with the applicant.

DHHS also plans to increase its own staff temporarily for direct service provision and for administration of HPRP funds. DHCA will be using HPRP funds to provide housing location services.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to sub-grantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response:

DHHS will competitively select non-profit sub-grantees to provide case management/service coordination services using HPRP funds through its existing Open Solicitation process.

DHHS is currently in the process of implementing the Housing First Model that is aligned to the current homeless Continuum of Care (CoC). The four essential

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components of the model include: Homeless Outreach and Intake; Homeless Prevention; Conversion of Emergency Shelters into Assessment Shelters; and, Rapid Exit to Permanent Housing. Homeless Prevention and Rapid Exit to Permanent Housing are the two components of the Housing First Model that will be the focus of HPRP funding.

The Montgomery County HPRP will provide financial assistance and housing stabilization services in accordance with HPRP eligibility requirements to individuals and families who are homeless or would be homeless if this assistance is not provided. The funds under this program will target two populations of persons facing housing instability:

- 1). *Homelessness Prevention Program* for individuals and families who are currently in housing but are at risk of becoming homeless and need temporary rent, utility assistance or other HPRP eligible assistance to prevent them from becoming homeless or assistance to move to another unit; and,
- 2). *Rapid Re-Housing Program* for individuals and families who are experiencing homelessness and need temporary assistance in order to obtain and retain stable, affordable housing.

Program services will be focused on linking program participants to community resources and mainstream benefits and helping them develop a plan for preventing future housing instability.

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its sub-grantees (limit 500 words).

Response:

Once received, funds will be allocated for eligible HPRP uses through an expansion of services provided through existing programs. Using existing programs as the "vehicle" for service delivery ensures that funds will be allocated in an effective, efficient and timely manner in accordance with all local procurement and HPRP requirements and in coordination with the CoC's strategies for homeless prevention and ending homelessness.

To ensure the effective and timely use of HPRP funds on eligible activities, DHHS will also hire additional, temporary staff for both direct service provision and for HPRP administration. DHCA will use staff for direct service provision through providing housing locator services.

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DHHS will use HPRP funds for eligible activities to augment Prevention and Rapid Re-Housing services in coordination with its non-profit partners, DHCA and the Housing Opportunities Commission (HOC). The Housing First Leadership Workgroup, which also serves as the Continuum of Care Board of Governors, will continue to provide guidance in keeping with the implementation plan for the Housing First Model.

DHHS will use the programs and procedures it already has in place to ensure the effective and timely use of HPRP grant funds for eligible activities. Financial reporting will utilize existing systems to track expenditures. The homeless management information system (HMIS) will track the progress of program participants. DHHS will hire a fiscal assistant to assist in meeting HPRP recordkeeping and reporting requirements. DHHS will follow its standard operating procedures for sub-grantee monitoring and oversight. These include on-site monitoring visits and performance standards and measurement.

Staffing Required:

The HPRP is being budgeted as a three-year program. Staffing costs for program administration are limited to no more than 5% of the allocation. Staffing associated with direct service delivery is reflected in the Homelessness Prevention and Rapid Re-Housing categories in the draft substantial amendment under section "E. Estimated Budget Summary" that follows. For ease of review, all staffing costs are noted below:

DHHS will use HPRP funds to support the following positions:

- 1 Fiscal Assistant to assist the DHHS Housing Stabilization Services Program Administrator with program recordkeeping and reporting requirements;
- 1 Case Manager/Service Coordinator to implement the prevention strategies
- 1 Case Manager/Service Coordinator assigned to Homeless Services to provide case management/service coordination to individuals/families exiting homelessness under rapid re-housing.
- 1 Income Assistance Program Specialist/Counselor (at the beginning of the third year of the HPRP) to expand the County's shallow Rental Assistance Subsidies Program (RAP).

DHCA will use HPRP funds to provide housing locator services, including housing search assistance and outreach to property owners.

STAFFING COST ESTIMATES	Year 1	Year 2	Year 3	Total
1 Fiscal Assistant	\$52,618	\$52,618	0	\$105,236
1 Case Manager for Prevention Assessment Team	\$65,000	\$65,000	0	\$130,000
1 Income Assistance Program Counselor for RAP			\$65,000	\$65,000

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1 Case Manager for Rapid Re-Housing Program	\$65,000	\$65,000	0	\$130,000
1 Housing Locator	\$60,000	\$60,000	0	\$120,000
Total	\$242,618	\$242,618	\$65,000	\$550,236

D. Collaboration

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

Response:

DHHS currently has many mechanisms of collaboration with key non-profit providers of shelter and prevention services. DHHS serves as the Continuum of Care coordination agency including administering the HMIS, conducts monthly Continuum of Care meetings with key non-profit and other governmental service providers at the executive director level as well as conducts provider meetings with front line staff providing prevention and homeless services.

The Special Needs Housing Service Area located within the Department of Health and Humans Services, under the guidance of Continuum of Care Board of Governors, will aggressively pursue and collaborate with local agencies that can serve similar target population that received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies.

2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response:

DHHS leads the homeless Continuum of Care process, conducts monthly CoC Governing Board meetings, and ensures coordination with mainstream providers such as public health, VA, TANF and Social Security benefits, the mental health and substance abuse treatment continuums of care, and minority service providers. The DHHS plans to continue to collaborate with all the appropriate Continuum of Care and mainstream resources regarding HPRP activities.

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3. Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee's Consolidated Plan (limit 250 words).

Response:

The Consolidated Plan and the County's Continuum of Care and the Housing First Model are consistent. The Consolidated Plan documents the need for additional affordable housing in the County, particularly for those at or below 50% of Area Median Income, the income level of the households to be assisted with HPRP funds.

The HPRP grant funds will go directly to the homeless and those threatened with homelessness. This funding will provide financial assistance and services to either prevent individuals and families from becoming homeless or help those who are experiencing homelessness to be quickly re-housed and stabilized.

Preventing homelessness, through early intervention, coordinated case management, and financial assistance, is a Consolidated Plan priority as is the provision of affordable housing, including affordable housing with supportive services, needed to help those already homeless.

E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee's preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re- housing	Total Amount Budgeted
Financial Assistance ¹	824,763	729,743	1,554,506
Housing Relocation and Stabilization Services ²	255,000	190,000	445,000
Subtotal (add previous two rows)	\$ 1,079,763	\$ 919,743	\$ 1,999,506

Data Collection and Evaluation ³	\$ N/A
Administration (up to 5% of allocation)	105,237
Total HPRP Amount Budgeted⁴	\$ 2,104,743

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¹Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

²Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

⁴This amount must match the amount entered in the cell on the table in Section A titled “Amount Grantee is Requesting.”

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F. Authorized Signature

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

Signature/Authorized Official

Date

Title